

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKKO D'AMBROSIO,

Plaintiff,

v.

ABBIGAIL RAJALA, et al.,

Defendants.

Case No. 1:24-cv-00678

Hon. Sunil R. Harjani

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND**

Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand (collectively, "Defendants"), by and through their undersigned counsel, respectfully move for an extension of time through and including November 27, 2024 to answer or otherwise respond to plaintiff Nikko D'Ambrosio's Second Amended Complaint in this matter (Dkt. #53). In support of this motion, Defendants state as follows:

1. On or about January 25, 2024, Plaintiff filed this suit. Dkt. #1.
2. On July 22, 2024, Plaintiff filed his First Amended Complaint. Dkt. #29.
3. On August 30, 2024, Defendants filed their Motion to Dismiss the First Amended Complaint. Dkt. #47.
4. On October 11, 2024, in response to Defendants' Motion to Dismiss, Plaintiff filed his Second Amended Complaint. Dkt. #53.
5. On October 15, 2024, the Court issued a Minute Order setting November 1, 2024 as the deadline for Defendants to answer or otherwise respond to the Second Amended Complaint. Dkt. #54.

6. Due to undersigned counsel's other case schedules, Defendants require additional time to prepare their responsive pleading.

7. To most efficiently respond to the Second Amended Complaint on behalf of all three Defendants, Defendants respectfully request an extension of time to November 27, 2024 to answer or otherwise respond to the Second Amended Complaint.

8. Prior to filing this motion, counsel for Defendants conferred with Plaintiff's counsel regarding the relief sought by this motion. Plaintiff's counsel represented that Plaintiff has no objection to Defendants' requested extension of time.

9. This is Defendants' first request for extension of time to answer or otherwise respond to the Second Amended Complaint. On July 29, 2024, Defendants filed an unopposed motion to respond to Plaintiff's First Amended Complaint (Dkt. #34), which the Court granted (Dkt. #36).

10. This request is sought in good faith and not for purposes of delay. No prejudice or substantial delay will result if Defendants' request for extension of time is granted.

WHEREFORE, Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand respectfully request that the Court grant their Unopposed Motion for Extension of Time to Answer or Otherwise Respond, enter an order extending Defendants' time to answer or otherwise respond through and including November 27, 2024, and award such other and further relief the Court deems just and proper under the circumstances.

Dated: October 24, 2024

Amanda N. Catalano
Megan E. Ryan
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209 S. LaSalle Street, 7th Floor
Chicago, IL 60604

Respectfully submitted,

SPILL THE TEA, INC.,
PAOLA SANCHEZ, and
BLAKE MILLBRAND

By: /s/ Amanda N. Catalano

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